

UNITED STATES DISTRICT COURT **FILED**

for the

October 02, 2023

Western District of Texas

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

United States of America)

v.)

JONATHAN R. RANGEL)

BY: SL

DEPUTY

Case No. **1:23-mj-668-DH***Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 29-30, 2023 in the county of Williamson in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*Title 18, Section 1704
Title 18, Section 2114Unlawful Possession USPS Keys
Robbery - US Mail and US

This criminal complaint is based on these facts:

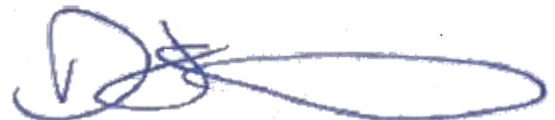
See Attached Affidavit

☐ Continued on the attached sheet.
Complainant's signature

William B. Witt / U.S. Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/02/2023*Judge's signature*City and state: Austin, Texas

Dustin Howell, United States Magistrate Judge

Printed name and title

AFFIDAVIT

Affiant, William B. Witt, being duly sworn, does depose and state the following:

1. I have been employed as a criminal investigator with the United States Postal Inspection Service for the past 28 years. During my employment, I have led, conducted and/or participated in hundreds of investigations involving offenses relating to the United States Postal Service (USPS), including but not limited to mail theft, identity theft, burglary, armed robbery, improvised explosive devices (IEDs), homicide, aggravated assault, narcotics trafficking, firearms trafficking, import and export violations, money laundering, child pornography and exploitation, and all manner of financial fraud. I have extensive training and experience investigating these offenses, particularly when communication facilities such as the United States Mails and private delivery couriers (United Parcel Service (UPS), Federal Express (FedEx), etc.) are employed to facilitate the criminal activity. Throughout my career with the Inspection Service, I have conducted a significant number of investigations involving robberies and assaults. Through these investigations as well as my formal training, I have become familiar with patterns of activity regarding robberies of USPS Letter Carriers and the methods criminal offenders employ to plan, coordinate, and conduct these robberies.

2. The facts set forth in the instant affidavit are based upon my personal observations and information that I obtained from other law enforcement officers familiar with the investigation. Because this affidavit is being submitted for the sole purpose of establishing probable cause, it does not purport to represent or set forth all my knowledge of, or investigation into, the instant matter. Rather, I have set forth facts that I believe are sufficient to establish probable cause for the issuance of the requested arrest warrant.

3. Based on my training and experience in similar investigations, coupled with the evidence set forth in this affidavit, there is probable cause to believe that CAMREN HAMILTON and JONATHAN RANGEL, aided and abetted by each other, stole, purloined, and obtained official USPS Arrow Keys, also commonly referred to as master keys, in violation of 18 U.S.C. § 1704. There is also probable cause that RANGEL assaulted multiple letter carriers with the intent to rob, steal, and purloin mail matter in violation of 18 U.S.C. § 2114.

4. A USPS Arrow Key ("Arrow Key") is a universal key or master key utilized by USPS employees, including Letter Carriers, to access collection boxes, outdoor parcel lockers, cluster box units, and apartment panels. Given the broad access they afford, Arrow Keys are designated as accountable property. The USPS has implemented extensive security measures governing the possession and use of Arrow Keys by employees. Arrow Keys must be signed out each day by employees and returned at the close of their tour of duty. The keys are engraved as USPS property, with a unique serial number. USPS regulations require that the loss or theft of an Arrow Key requires a corresponding entry into the National Crime Information Center (NCIC), in the same manner that a stolen firearm would be documented.

5. Based on my training and experience in other robbery and mail theft investigations, I know that criminals seek to obtain Arrow Keys for a variety of reasons. A stolen Arrow Key allows a criminal to access hundreds of mail receptacles within a given metropolitan area. This leads to volume attacks on mailboxes where the criminal can steal specific items such as outgoing personal checks and money orders. Based on my training and experience, I know that in another variation, criminal elements will engage in a more targeted scheme in which they steal an individual's identity; conduct various fraudulent financial transactions, such as filing a tax return or obtaining a new debit/credit card; and use the Arrow Key to recover the resulting tax refund or credit card once it is mailed to the unwitting victim. As the check or card is mailed to the victim's known address, internal controls often do not detect the fraud. Since the offenders can use the Arrow Key to recover the check without alerting the victim, the victims often have no knowledge that their identity has been compromised until they attempt to file their own taxes or are contacted by a debt collection agency.

6. Based on my training and experience in other robbery and mail theft investigations, I know that criminal elements will undertake significant steps to gain access to Arrow Keys. I know that within the last five years, the number of USPS employees assaulted and murdered to obtain Arrow Keys has increased dramatically. I know that USPS vehicles and facilities have been burglarized to access the keys.

7. On September 16, 2023, a USPS Letter Carrier (Letter Carrier #1) was on-duty delivering U.S. Mail at the residence located at 4900 Manchester Circle, Austin, Texas 78745. At

approximately 1600, Letter Carrier #1 was approached by a Hispanic male, approximately 20-25 years of age, wearing a black hooded sweatshirt and dark pants. Letter Carrier #1 advised that the male subject stated, "Give me the key." Letter Carrier #1 stated that the subject repeated the declaration and had one hand concealed beneath the sweatshirt, with an object pressed against the fabric pointed at the victim. Letter Carrier #1 immediately recognized that the subject was referring to his assigned USPS Arrow Key, which was attached to his belt loop. Letter Carrier #1, believing that the subject had a gun and fearing for his life, attempted to remove the Arrow Key. The subject grabbed the Arrow Key from Letter Carrier #1's belt loop and ran away. Based on witness statements and/or available video recovered from adjacent residences and businesses, Inspectors determined that the subject ran to a waiting black GMC Yukon that was driven by an unknown suspect.

8. On September 29, 2023, a USPS Letter Carrier (Letter Carrier #2) was on-duty delivering U.S. Mail at the residence located at 3208 Primrose Trail, Georgetown, Texas 78628. At approximately 1445, Letter Carrier #2 was approached by a Hispanic male, approximately 20 years of age, with dark curly hair, wearing a black hooded sweatshirt and a Covid Mask. Letter Carrier #2 advised that the male subject stated, "Give me the key." Letter Carrier #2 immediately recognized that the subject was referring to her assigned USPS Arrow Key. Letter Carrier #2 stated that the subject reached into her vehicle and began assaulting her, punching her multiple times in her side. Letter Carrier #2 stated the subject reached into the vehicle, grabbed her assigned USPS keys from the ignition, and ran away. Letter Carrier #2 advised that her assigned Arrow Key was not on the key ring that was stolen, but rather only the vehicle key and one or more other USPS keys used to access boxes on her route. Letter Carrier #2 was later treated at a local medical facility for injuries that included bruised ribs, cuts, and abrasions. Based on witness statements and/or available video recovered from adjacent residences and businesses, Inspectors determined that the subject ran to a waiting white Porsche Cayenne SUV, driven by an unknown suspect. Agents noted the subject entered the vehicle through the rear passenger side door.

9. On September 29, 2023, a USPS Letter Carrier (Letter Carrier #3) was on-duty delivering U.S. Mail at the residential cluster box located at 1108 Highknoll Lane, Georgetown, Texas 78628. At approximately 1500, Letter Carrier #3 was approached by a Hispanic male, wearing a black

hooded sweatshirt and a Covid Mask. Letter Carrier #3 advised that the male subject stated, "Give me the key." Letter Carrier #3 immediately recognized that the subject was referring to her assigned USPS Arrow Key. Letter Carrier #3 stated that the subject repeated the declaration and kept at least one hand concealed beneath the sweatshirt, with an object pressed against the fabric pointed at the victim. Letter Carrier #3 stated that the subject continued to demand the key and began assaulting her, jabbing her sides. Letter Carrier #3, believing that the subject had a gun and fearing for her life, stated that she screamed for help and the subject finally ran away. Based on witness statements and/or available video recovered from adjacent residences and businesses, Inspectors determined that the subject ran to a waiting white Porsche Cayenne SUV, driven by an unknown suspect. Agents noted the subject entered the vehicle through the rear passenger side door.

10. On September 30, 2023, a USPS Letter Carrier (Letter Carrier #4) was on-duty delivering U.S. Mail at the business located at 2110 N Interstate 35 Frontage Road, Round Rock, Texas 78681. At approximately 0930, Letter Carrier #4 was approached by a Hispanic male, approximately 22 years of age, wearing a black hooded sweatshirt, black hat, and shorts. Letter Carrier #4 advised that the male subject stated, "Give me the key." Letter Carrier #4 immediately recognized that the subject was referring to his assigned USPS Arrow Key. Letter Carrier #4 stated that he told the subject that the key was in the USPS delivery vehicle. Letter Carrier #4 stated that when the subject began searching the vehicle, the victim ran away and yelled at nearby witnesses to call the police. Letter Carrier #4 stated that the subject took the vehicle keys, which were engraved with vehicle number #0212226, and ran away. Based on witness statements and/or available video recovered from adjacent residences and businesses, Inspectors determined that the subject ran to a waiting white Porsche Cayenne SUV, driven by an unknown suspect. Agents noted the subject entered the vehicle through the rear passenger side door.

11. On September 30, 2023, a USPS Letter Carrier (Letter Carrier #5) was on-duty delivering U.S. Mail at the residence(s) located at 1200 Abbey Road, Round Rock, Texas 78681. At approximately 1000, Letter Carrier #5 was approached by a Hispanic male, wearing a black hooded sweatshirt and shorts. Letter Carrier #5 advised that the male subject stated, "Give me the key." Letter Carrier #5 immediately recognized that the subject was referring to his assigned USPS

Arrow Key. Letter Carrier #5 stated that the subject repeated the declaration and kept at least one hand concealed beneath the sweatshirt, with an object pressed against the fabric pointed at the victim. Letter Carrier #5, believing that the subject had a gun and fearing for his life, stated that at some point the subject pressed the concealed object against his abdomen and repeated the declaration to give him the key. Letter Carrier #5 stated that the subject then lunged at him, grabbed his Arrow Key, and ran away. Official USPS records identified the serial number of the Arrow Key assigned to Letter Carrier #5 as "68-3528." Based on witness statements and/or available video recovered from adjacent residences and businesses, Inspectors determined that the subject ran to a waiting white Porsche Cayenne SUV, driven by an unknown suspect.

12. On September 30, 2023, at approximately 1010, Postal Inspectors and officers of the Round Rock Police Department identified a white Porsche Cayenne SUV, bearing Texas license SHC-7548, traveling south from the area of the most recent robbery. Officers initiated a felony vehicle stop. The driver, later identified as CAMREN HAMILTON, exited the vehicle and was taken into custody without incident. The passenger, positioned in the rear passenger side seat, later identified as JONATHAN RANGEL, was removed from the vehicle without incident. Both subjects denied any knowledge of the robberies and gave conflicting statements before invoking their right to speak to an attorney before further questioning.

13. Letter Carriers #4 and #5 positively identified RANGEL as the subject who robbed or attempted to rob them. An initial search of the Cayenne incident to the stop resulted in the recovery of a loaded Canik 9mm handgun in the back under the driver's seat. Officers and Inspectors noted that a dark hooded sweatshirt, covid mask, and used latex gloves were in plain view as well. These items were consistent with items used in all the reported robberies. The search of the vehicle also resulted in the recovery of the keys for USPS Vehicle #0212226, which were taken from Letter Carrier #4, as well as USPS Arrow Key 68-3528, which was stolen from Letter Carrier #5.

14. Officers and Inspectors noted that a cellular telephone in the driver's compartment was actively mapping directions to 1301 Crossing Place, Apartment 1015, Austin, Texas 78741, suggesting the subjects were enroute to the address at the time of their arrest. While Inspectors have not examined all the evidence recovered from the suspect vehicle, the items included, but were not limited to multiple cellular phones, financial instruments, debit and credit cards, more

than \$5,000 in U.S. currency, miscellaneous documents, clothing, two suitcases, and a small quantity of suspected marijuana. Inspectors noted the large amount of currency as particularly significant because neither RANGEL nor HAMILTON had any substantive earned income within the past year according to available financial records. Based on training and experience in similar robbery investigations, I know that mail theft and the associated financial fraud generate substantial illicit profits which offenders often retain as currency.

15. Postal Inspectors determined that HAMILTON had rented the white Porsche SUV from a luxury car rental business in Austin. Inspectors learned that the owner of the rental business was very familiar with HAMILTON and SMITH, as he frequently rented high end luxury vehicles to them for substantial periods of time. The owner stated that the subjects claimed to be music promoters.

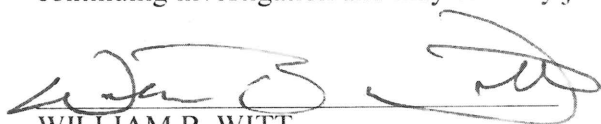
16. Postal Inspectors determined that on September 16, 2023, HAMILTON had rented a black GMC Yukon. HAMILTON kept the vehicle only a few hours before switching it out for another vehicle. The rental owner believed HAMILTON's request was odd but switched the vehicle out after only a few hours. The owner recalled that when his staff was cleaning the Yukon in preparation for its next rental, they found a cellular telephone, handgun ammunition, and used latex gloves in the vehicle.

17. I recalled that Letter Carrier #1 was robbed of their official USPS Arrow Key on September 16, 2023, and that the robbery shared several similarities to the events of September 29th and September 30th. More specifically, I noted that the suspect's physical description, suspect's clothing, and the suspect's statements and method of operation were consistent with RANGEL and the later robberies. Second, I recalled that the suspect vehicle used in the September 16th robbery was believed to be a black GMC Yukon. Third, I observed that the relatively brief time that HAMILTON rented the black GMC Yukon coincided with time of the robbery. Finally, I noted that the discovery of the handgun ammunition and used latex gloves in the Yukon were consistent with the handgun and used latex gloves recovered from the Porsche SUV.

18. Based upon the evidence developed at the scenes of the robberies, evidence recovered from the Porsche SUV, and information compiled in subsequent interviews, there is probable cause to

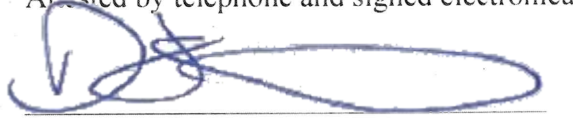
believe that HAMILTON and RANGEL, aided and abetted by each other, committed violations of federal law.

19. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application and the accompanying criminal complaint and arrest warrant documents. Based upon my training and experience, I have learned that criminals actively search for criminal affidavits and search warrants via the Internet and disseminate them to other online criminals through online forums. Premature disclosure of the contents of this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.



WILLIAM B. WITT
U. S. Postal Inspector

Attested by telephone and signed electronically under Fed. R. Cr. P. 4.1 on October __, 2023.



DUSTIN HOWELL
UNITED STATES MAGISTRATE JUDGE